13 January 1997

MEMORANDUM

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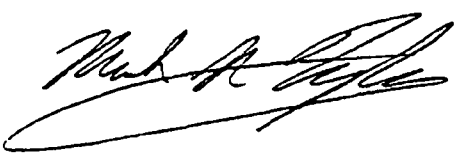
Subj: NSA MEMPHIS BRAC CLEANUP TEAM (BCT) MEETINGS MINUTES

Encl: (1) Minutes from 2-4 December 1996 BCT Meeting

1. Enclosure (1) is forwarded for your review and information. Sorry for the late delivery, my hard drive crashed and I didn't have a back-up.

2. Please call/e-mail if you have comments and/or questions: (803) 820-5573. DSN 583. e-mail: mrtaylor@efdsouth.navfac.navy.mil.



MINUTES

NSA MEMPHIS BCT MEETING
2-4 DECEMBER 1996

The BCT meeting convened at 1130 on Monday, 2 December at EPA IV. The following were in attendance:

Mark Taylor, SOUTHDIV
David Porter, SOUTHDIV
Lawson Anderson, EnSafe
Brian Mulhearn, EnSafe
Brian Donaldson, EPA IV
Jim Morrison, TDEC
Jack Carmichael, USGS

The meeting began with a discussion of follow-up assignments from the October BCT meeting (see December agenda for assignments):

Lawson Anderson:

- SWMU 8 RFI Report submitted to BCT/Project Team on 11/6/96.
- Revised CAMP (incorporating Jim Morrison's comments on the status of sites and revising the schedule) out in the next couple of weeks.
- Technical Memorandum on the North Fuel Farm submitted to BCT/Project Team on 11/18/96.
- Technical Memorandum on Hydropunch Rationale submitted to BCT/Project Team on 11/18/96.
- Memorandum on Monitoring Well Strategy submitted to BCT/Project Team on 11/25/96.
- SWMUs 15 and 21 RFI Report submitted to SOUTHDIV, NSA Memphis, and USGS on 11/21/96.
- Assemblies G & H Workplan submitted to SOUTHDIV, NSA Memphis, and USGS on 12/3/96.
- Assembly E IDW drums are staged, work will be underway in the next few weeks.
- A geophysical investigation of the old hangar area (N-6) to locate a possible UST will be accomplished by Larry Hughes (EnSafe) in the next week or two.
- Awaiting results of the passive soil gas samplers before proceeding with a workplan for additional sampling at SWMU 2 (Southside Landfill).
- Assembly E RFI report (with nature and extent of SWMU 2 to-date) will be submitted to SOUTHDIV, NSA Memphis, and USGS in December.
- The workplan for the CMS will probably occur in April 97 (after the SWMU 7 RFI report).
- The RFI/CMS responsibilities are "on-going".

Brian Donaldson:

- Review comments for SWMU 60 were available.
- SWMU 8 RFI Report hasn't been reviewed to date.
- Revised CAMP hasn't been received yet.
- Review comments on the North Fuel Farm tech memo were available.
- Review comments on the Hydropunch Rationale tech memo were available.
- Monitoring Well Strategy Memo hasn't been reviewed at this time.
- General Human Health Risk Assessment Approach hasn't been reviewed at this time.
- Memo on Gray Area Lakes. Fish Tissue Results. hasn't been reviewed at this time.
- EPA Risk Assessors review comments were available for SWMU 9 (Sewage Lagoons) and SWMU 60 (Northside Landfill).
- Letters of concurrence on RFI/CSI Reports for Assemblies B. C. and D were not provided due to outstanding comments to be resolved.

Rob Williamson (joined the meeting at 1400):

- Awaiting Assembly E IDW to be screened and characterized before arranging for disposal.
- The cleanup of SWMU 66 by Dynecorp is virtually complete (there is one dumpster left with scrap metal in it). Awaiting SWMU 66 VCA report.
- The disposal of the soil piles at SWMU 8 is being arranged. BFI had some concerns on whether any hazardous waste had been placed in the soil piles.

David Porter:

- Attorneys probably need to meet again to discuss property transfer issues. The CERCLA approach (dirty transfer) instead of the ownership of the groundwater approach will be pursued. Jim M. mentioned that we should fast track this due to TDEC restructuring of the OGC to the Department of Law in February/March.
- The EIS ROD should be signed in the spring, therefore, it will probably be the summer before actual property transfer can occur. Transfer will occur in two parcels: 1. The airfield runway and clear zone. 2. Everything else that is slated to be transferred. EnSafe will update the EBS and prepare two FOSTs around 4/97.

Mark Taylor:

- Assisted EnSafe with the tech memo on long-term ground water monitoring sampling rationale, which was submitted to the BCT/Project Team on 11/25/96.

Jim Morrison:

- The radiation survey should occur in mid-December.
- SWMU 8 report was reviewed with no comments.
- Revised CAMP hasn't been received yet.
- Review comments on the North Fuel Farm tech memo were available.
- Review comments on the Hydropunch Rationale tech memo were available.

- Monitoring Well Strategy Memo was reviewed.
- General Human Health Risk Assessment Approach was reviewed but deferred to EPA IV expertise.
- Memo on Gray Area Lakes. Fish Tissue Results was reviewed.
- The TDEC dry cleaner program will not be effective until late 97. Cost recovery could be pursued by the Navy if it can be proved that the Navy's property was impacted by a neighboring property. A sampling plan for the dry cleaners should reflect a sufficient number of samples to make this determination. Passive soil gas samplers may be used if found to be successful at other locations. Groundwater samples will be required but passive soil gas could assist with sampling locations. Samples should be retrieved from behind the dry cleaners because of the visibly stained soil. TDEC will gain access to the dry cleaners on Navy road so that sampling can occur. EnSafe will locate any utilities.
- Letters of concurrence on RFI/CSI Reports for Assemblies B, C, and D were not provided due to EPA IV comments to be resolved.

Jack Carmichael:

- Access to the area south of Big Creek will be difficult. A small rig would be required. If passive soil gas works. transects could be utilized to assist the overall sampling plan.
- The RFI/CMS responsibilities are "on-going".

At this time Jack showed the latest particle tracking maps which indicated a good correlation with measured data.

The next agenda item discussed was the tech memo on the Hydropunch Rationale for the Airfield Apron Area. Jim M. expressed a concern on the sampling technique which would affect the quality of the results. Also. a magnified view of the apron area was requested by Jim. The consensus was to add two more sampling locations on the southside of bldg. N-126 downgradient of the suspected source area. This topic was tabled for Tuesday morning.

Tuesday December 3 at 0800:

Robert Smith (EnSafe) joined the meeting. The Hydropunch Rationale was revisited. After much discussion the consensus was:

- Move point 1 (Figure 1) to the Northwest approximately 100 feet and perform a complete vertical profile (every 5 feet) to assist with the determination if a DNAPL is present, and add two additional sampling points on the southside of bldg. N-126 downgradient of the suspected source area with the minimum sampling interval occurring at the upper/middle/lower fluvial deposits. Laboratory Analysis would be overnight to a local lab.
- If possible retrieve TOC data from the Cockfield formation.
- Need a better presentation of what our existing data is versus the rationale of the proposed work. Build a case for a DNAPL not being there.

- Field work could begin the week of January 6. 1997.
- The drilling technique and sample collection must be altered (e.g. no surging, need more "tits" on the sampling tip for better sample extraction) or the data obtained will be in question.

The next agenda item was the North Fuel Farm Tech Memo. Brian D. and Jim M. had the following comments:

- Page 7, 1st Para. Drop the word "may" have been impacted.
- Page 10. 1st Para. State what assumptions go into residential and commercial scenarios (Could reference previous EAH Tech Memo). State that the commercial scenario is basically equivalent to the industrial scenario.
- Page 15. 1st Para. Include tank specification that describes how the tanks will be cleaned.
- Page 17, 1st Para. State what the confirmation samples will be compared to.
- Page 4, SOW. Update tech memo date.
- Generally, need more referencing in the document. Also. need a contingency if gross contamination is found.

The next item discussed was EPA IV comments on the Assembly B RFI Report:

- Table 8-6. Check dieldren (exceedences are backwards).
- Page 8-31, 1st bullet. Clarify the sentence.
- Response to Comments. #4 under Specific Comments to Preparer of Ecological Risk Assessment. This comment wasn't addressed.

The next item discussed was the Reference Concentration (RC) Tech Memo.

- Table 1, RC Tech Memo of 9/23/96. Table 1 has a RC for Nickel in subsurface soil = 59.8 ppm. This value needs to be recalculated based on using ½ of the detection limit.

The next item discussed was EPA IV comments on the Assembly C CSI Report:

- Page 6-9. Same comment as for the RC Tech Memo regarding nickel's RC.

There was a question on the Dieldren Tech Memo as to what Figure 1 referred to. EnSafe will update the Tech Memo and reissue it. Brian D. will run it by Ted Simon for approval.

The next item discussed was EPA IV comments on the Assembly D CSI Report:

- A question came up as to whether outdated RBC tables should be updated with document revisions. The consensus was to keep the RBCs the same i.e., keep the RBC tables the same for subsequent document revisions.
- EnSafe will accomplish the removal and confirmation samples for SWMU 44 along with the SWMU 59 removal.

Update the PRE for SWMU 64 since the slope factor has changed for PCBs.

A discussion took place regarding the HSWA permit requirement in Appendix F. that for class A & B carcinogens the action level is $1X10^{-5}$. How does this affect our current risk assessments? Brian D. will check into.

The next agenda item of discussion was the RFI report for SWMU 8. Jim M. thought the document was of good quality, but mentioned that the document should be rechecked for completeness of references. Brian D. had not seen the document yet.

The next agenda item for discussion was the PID screening of the Assembly E IDW drums. The screening is to be accomplished in the next few weeks. The same screening procedure should be used throughout for consistency of results. The resulting data will be evaluated by the BCT for possible follow-on sampling. Jim M. would like to be present for the screening.

The next agenda item for discussion was the Monitoring Well Abandonment Tech Memo of 11/25/96:

- Page 1, Introduction, 1st Para. Change 47 to 48 wells will be abandoned.
- Page 1, Background Wells. Add how the wells will be abandoned.
- Page 2. SWMU 5. Add that the two redundant fluvial deposits wells are 005G4AUF and 005G4BUF.
- Page 3. SWMU 7, 1st sentence. State that contamination was detected in only "one" loess well.
- Page 3, SWMU 7, 2nd sentence. Change sentence to read "(located in an area with low contaminant concentrations in the fluvial deposits)"
- Table. Well BGMW09UF should be abandoned.
- Add or reference a map of the wells. Possibly color code wells to be abandoned versus wells remaining.

The next item on the agenda was passive soil gas at SWMU 2. Once all the soil gas results are in and evaluated (next few weeks), a Tech Memo will be prepared for possible additional sampling locations with rationale.

The next agenda item for discussion was the Tech Memo on the General Human Health Risk Assessment Approach with consensus being that:

- The Tech Memo would be used as a reference in subsequent documents thereby eliminating boiler-plate type material from documents (in accordance with the Paper Reduction Act).
- Need to add an acronym list.
- Jim M. will forward to the TDEC technical section, and Brian D. will let Ted Simon review it.

The next agenda item discussed was the SWMU 60 RFI report. Brian D. had the following comments:

- Page viii, last Para. COPC needs to be defined. Also, on the next page define BRA.
- Page 2-2, last sentence. Clarify why no sample data was available.

- Page 3-1. Define FDEM.
- Page 4-14, last Para., next to last sentence. Explain why solvents are in the basil portion.
- Page 4-19, last Para. Why are we micropurging? Is this an approved method? Can it be referenced from the SOPQAM?
- Page 4-21, last Para. There is a discrepancy with the two different techniques.
- Page 5-1, 2nd Para. For loess drinking water standards use similar language as in the SWMU 8 RFI report. Also, in the same paragraph remove the reference to SWMU 15.
- Figure 5-1. The formations don't match where the transects intersect.
- Page 5-5, under loess/alluvium. Use confined/semiconfined instead of confined.
- Page 6-15, Table 6-1. For Endrin Aldehyde and Aroclor 1260 the k superscript for Compound Exceeds SSL is not correct.
- Page 6-19, 1st Para. From Table 6-1 Aldrin is not above the SSL. Also, the next sentence references organic compounds in Figure 6-5, where Figure 6-5 is for TPH. The last sentence of this same paragraph should include MCPP and MEK as compounds that do not have a published SSL.
- Page 6-27, 1st Para. Figure 6-7 is the wrong figure number. Also, the text for sample 60S0001 (5-7 foot interval and TPH of 64,000,000 ppb) in this paragraph doesn't match the results as shown on Figure 6-6 (7-8 foot interval and TPH of 6,400,000 ppb). Also, Table 6.3 has more detections listed than shown on Figure 6-6.
- Page 6-27, 2nd Para. Recalculate nickel.
- Table 6.4. Analyte Exceeds SSL should not be labeled yes if there is no SSL value.
- Table 6.6. Revise Table 6.6 so that it is more clear which constituents apply to which groundwater well.
- Page 6-38. Check the RBC/MCL for 1.1 DCA and 1.2 DCA.
- Page 6-45, 1st sentence. 6 metals are "assumed" to exceed MCLs since one doesn't exist. Also, in the same paragraph, the reference to Table 6.9 doesn't fit, and clarify why there was an increase in lead concentrations in the two loess wells.
- Page 6-51, 1st Para. The paragraph is not correct since the previous sampling event had concentrations exceeding the MCL.
- Brian M. explained which Baseline Risk Assessment comments could be ruled out based on the tech memo.

The next agenda item discussed was the Gray Area Lakes, Fish Tissue Sample Results. The following comments were generated from the discussion:

- State what the assumptions are e.g., a subsistence fisherman is ...
- Table 2, add lake sampled category e.g., Golf Course Lake etc.
- The Golf Course Lake will stay catch and release only.
- Recalculate the risk, based on a more realistic assumption like a weekend subsistence fisherman only.
- Page 5, 1st Para. Why was the Belted Kingfisher selected?
- Page 5, 2nd Para. Why was DDE used as the indicator chemical for sublethal toxicity?

The next item on the agenda was the risk assessment for SWMU 9. Brian D. will forward EPA IV risk assessment comments to Brian M.

The next item on the agenda discussed was the preliminary risk assessment on PCBs in the ditch near SWMU 57. The following comments were generated:

- A question arose that the HSWA Permit contains an action level of $1X10^{-7}$ for class A and B carcinogens while we have been using $1X10^{-4}$ to $1X10^{-6}$ as an acceptable risk range. Brian M. thought we were correct in our approach. Brian D. would check to see if there was a problem.
- The new road will probably affect the ditch.
- Show the recreational risk numbers in a column.
- Show the 114 ppm risk estimate in a column for comparison.

Wednesday December 4, at 0800 (Brian M. absent):

Rob presented a few items for BCT concurrence:

- Is it OK for the city to lease the flying club hangar (bldg. 374)? The BCT concurred that it would be OK. but that right now it would require an independent FOSL. If the city waits until next year they will already have it.
- Is it OK to demolish bldg. 352 (SWMU 56) near the golf course? The BCT concurred that since this is an NFA SWMU there is no problem demolishing the building.
- Is there a problem with locating a youth center approximately 100 meters north of SWMU 14 (former bldg. S-140 and 7th ave. ditch)? The BCT concurred that this should not be a problem.

The next item on the agenda was to discuss the results from the VCAs at the Gas Pits. and SWMUs 3. 7. & 18 (the VCA reports will be submitted in a few weeks):

- Gas Pits. The group reviewed the results, the consensus was that the data does not warrant any additional investigation.
- SWMU 3. The group reviewed the results. the confirmation samples were less than the RBCs but not the SSLs. The consensus was the analytical results do not warrant any additional investigation.
- SWMU 7. The group reviewed the results. the confirmation samples were high for TPH. EnSafe will look into the applicability of the new Tennessee Petroleum Rules. which allow up to 1000 ppm of TPH to remain in the soil if there is a low hydraulic conductivity and the aquifer is non-drinking (which may apply to the loess).
- SWMU 18. The group reviewed the results and determined that additional investigation is needed. The ground water will probably have to be screened for VOCs. The work will be accomplished by DPT with the Assembly G & H work.

David P. proposed that the Corp of Engineers remove the remaining piping at the gas pits. Everyone agreed.

Brian D. had SWMU 5 risk assessment comments to be given to EAH.

The next topic on the agenda was the Assembly F results which generated the following comments:

- Methylene Chloride is practically ubiquitous in all sample results.
- Significant soil contamination detected at SWMU 39 will necessitate additional sampling to determine the extent.
- This topic was tabled until forthcoming analytical results are received.

The next item on the agenda was to discuss the document review schedule which resulted in the following proposal:

- Priority A (EPA/TDEC review comments by the January BCT) - SWMU 60 VCA, SWMU 16 CSI, Hydropunch Groundwater Sampling Rationale, and the North Fuel Farm Tech Memo.
- Priority B - CAMP, SWMUs 15/21 RFI Report, Long-Term Groundwater Monitoring Report, SWMU 10 CSI Report, and the VCA Reports (Gas Pits and SWMUs 3, 7, & 18).
- Lawson A. and Mark T. will propose ranking all other projects for team review.

The next item on the agenda was to discuss the RAB meeting on January 28. The following presentations and presenters were agreed to for the upcoming RAB:

- The Gray Area Lakes, Fish Tissue Sample Results (Jim M).
- The Assembly F results and if available the SWMU 2 soil gas results (EnSafe).
- Hydropunch groundwater sampling rationale (Brian D).
- EIS update (Darrell Molzan).

For the RAB, a fact sheet on natural attenuation and a poster on risk assessments is needed.

Other items:

- Brian D. stated that for the next BCT he would have to leave early on January 29.
- The February BCT meeting is tentatively scheduled to be held in Nashville with the lawyers attending to discuss property transfer issues.

Meeting Adjourned.